



Response to the UK Government Pathways to Work: Reforming Benefits and Support to Get Britain Working Consultation

June 2025

Close the Gap is Scotland's policy advocacy organisation working on women's labour market participation. We have been working with policymakers, employers and trade unions for more than 20 years to influence and enable action that will address the causes of women's labour market inequality.

1.0 Context Setting

At Close the Gap we are deeply concerned by the proposals set out in the UK Government's Pathways to Work consultation which will include significant cuts to disability benefits including Personal Independence Payment (PIP) and the health element of Universal Credit. These proposals have the purported aim of getting more people who are currently economically inactive into work. This is premised on the notion that the existing social security system acts as a disincentive to disabled people participating in the labour market. However, evidence shows that many disabled people want to work but are prevented by structural barriers to the workplace, which drives the disability employment gap and contributes to their higher levels of poverty. Social security measures can mitigate against these structural inequalities and support disabled people into employment, therefore, the current proposals have the potential to undermine Government's stated aims.

Close the Gap is particularly concerned about the detrimental impact on disabled women's equality and economic wellbeing, and the wider effects this will have on efforts to reduce poverty. Disabled women are among the most marginalised in the labour market, experiencing disproportionately high levels

of poverty and inequality compared to non-disabled women and disabled men. Despite this, their experiences are rarely considered in policymaking or by employers¹. Disabled women face a wider gender pay gap than non-disabled women² and are more likely to be underemployed and economically inactive³. When they are employed, they are more likely to be in low-paid and precarious work which is a major cause of the higher level of poverty they experience⁴.

This is clearly evidenced in current disability pay gap statistics. Disabled employees earn, on average, 17% less than non-disabled employees, however, there is also a pay gap between disabled women and disabled men, with disabled women earning 11% less than disabled men. Comparing disabled women with non-disabled men reveals a pay gap of 24%, providing clear evidence of the intersecting inequalities faced by this group of employees⁵. This data shows that disabled people are not a homogenous group, by virtue of their differing conditions and impairments, but also because of other oppressions they experience such as gender and race. The persistent disability pay gap is further compounded by the additional cost of being disabled which is currently estimated to be around an extra £1,010 a month on average⁶.

In addition, the framing of benefits as a "barrier" to employment ignores the structural inequalities that disabled women face in accessing work, such as discrimination in recruitment practice, inaccessible workplaces, lack of flexible working, lack of employer awareness of disability and how to implement reasonable adjustments, and inadequate support services including severe delays in the Access to Work programme. Many disabled women use PIP to cover essential costs that enable them to work in the first place, as PIP is designed to help with the extra living costs of long-term health conditions or disabilities⁷. Removing this support will force many disabled women out of employment rather than into it.

This Green Paper is being brought forward in the context of profound socio-economic inequalities for disabled women. The lasting impacts of austerity

¹ Close the Gap (2024) *Emerging Findings From Close The Gap Research On Disabled Women And Work*

² TUC (2023) *Jobs and pay monitor - disabled workers*

³ Close the Gap (2018) *The Gender Penalty: Exploring the causes and solutions to Scotland's gender pay gap*

⁴ Close the Gap (2024) *Emerging Findings From Close The Gap Research On Disabled Women And Work*

⁵ Trades Union Congress (2024) *Disability pay and employment gaps*

⁶ Scope (2025) *Disability in the UK*

⁷ UK Government (2025) *Personal Independence Payment (PIP)*

measures, the Covid-19 pandemic, the ongoing cost of living crisis, which all disproportionately affected disabled women, have driven the rising levels of poverty and deep structural inequalities they face.

During the Covid-19 pandemic, women's employment and incomes were hit hardest with unequal care responsibilities, job losses in female-dominated sectors, and the continued undervaluing of women's work, which was essential to the pandemic response⁸. Research from the Glasgow Disability Alliance (GDA) found that disabled women experienced employment challenges as a result of the pandemic including lack of employment support, discrimination, increased difficulties in progressing Access to Work claims, and pressure from employers to return to the workplace⁹. Many disabled women also lost social care support during the pandemic which will have created additional barriers to maintaining paid employment¹⁰. Additionally, GDA highlight that disabled women described increased challenges and pressures surrounding household responsibilities such as shopping, housework and caring responsibilities for children and relatives¹¹. Disabled women reported huge impacts on their ability to cope, as these additional challenges were, and still are, exacerbated by social care cuts, reductions in health and childcare services, as well as rising poverty, isolation and mental health impacts¹². The proposed cuts to social security will exacerbate these known issues further.

The cost of living crisis has placed further pressure on women's incomes, with women more likely to be in low-paid, part-time, insecure work and to head lone parent households¹³. Disabled households are disproportionately impacted, with disability-related costs adding an estimated £1,067 per month to household budgets and disabled households requiring an additional £1,010 a month to have the same standard of living as non-disabled households¹⁴. Joint work from The Scottish Women's Budget Group and GDA show that disabled women continue to feel the strain of the situation created by the pandemic while simultaneously experiencing the unequal impact of the cost of

⁸ Close the Gap and Engender (2020) *Gender & Economic Recovery*

⁹ Glasgow Disability Alliance (2022) *Triple Whammy: Disabled Women's Lived Experiences of Covid-19 Voices, Priorities and Actions for Change*

¹⁰ Ibid.

¹¹ Ibid.

¹² Ibid.

¹³ House of Commons Library (2025) *Youth Unemployment Statistics*

¹⁴ Scope (2024) *Disability Price Tag*

living crisis¹⁵. This research found that over double the number of disabled women respondents, compared with non-disabled women in related studies, disclosed they were struggling to manage food costs. This totalled 63% compared with 31% of non-disabled women. Similarly, a higher number of disabled women were struggling to manage transport costs – 48% compared with 23% of non-disabled women. 60% of disabled women were struggling with energy costs compared with 31% of non-disabled women. Women in the survey revealed they were struggling at higher levels because they often had higher day to day costs as a result of being disabled or having an impairment or long-term health condition¹⁶.

Disabled people, and disabled women in particular, face a disproportionate risk of poverty. This is driven partly by the additional costs associated with disability and ill-health, and partly by the barriers to work that disabled people face¹⁷. In 2023, the poverty rate for disabled people was 30%, 10 percentage points higher than the rate for people who were not disabled¹⁸. Nearly half of all people who were disabled and living in poverty had a long-term, limiting mental health condition – around 2.4 million people¹⁹. The poverty rate for this group was 50%, compared with 29% for people with a physical or other type of disability²⁰. Disabled women have faced rising rates of poverty, worsening health outcomes, and barriers to employment exacerbated by delays in NHS treatment and the wider erosion of social infrastructure²¹.

The UK Government's own impact assessment identifies that the proposed package of social security cuts could push an extra 250,000 people, including 50,000 children, into relative poverty²². This not only shows the devastating effect the cuts will have on disabled people but it also undermines the Government's purported ambitions to tackle child poverty. Women's poverty is inextricably linked to child poverty so any measures that negatively affect disabled women's incomes will have a detrimental consequence for child poverty. As a public body, UK Government is legally required advance equality

¹⁵ The Scottish Women's Budget Group and Glasgow Disability Alliance (2022) *Feel my life is ever diminishing – the pressures build and life gets smaller*

¹⁶ Ibid.

¹⁷ Joseph Rowntree Foundation (2025) *UK Poverty 2025: The Essential Guide to Understanding Poverty in the UK*

¹⁸ Ibid.

¹⁹ Ibid.

²⁰ Ibid.

²¹ Joseph Rowntree Foundation (2023) *UK Poverty 2023: The Essential Guide to Understanding Poverty in the UK*.

²² BBC (2025) *Benefits reform must be pushed through, says PM*

and tackle discrimination under the public sector equality duty. It is clear that the proposed cuts do neither as it is disabled people, and disabled women especially, who already experience deep inequalities, that will be most affected.

Close the Gap is currently undertaking a research project on disabled women's labour market experiences in Scotland. The emerging findings support existing evidence that disabled women are more likely to be underemployed and economically inactive compared to non-disabled women. When they are employed, they often work in low-paid, insecure jobs, which contributes to higher rates of poverty among disabled women. The research identifies a wide range of barriers to employment, including discriminatory workplace cultures, including in recruitment practices, inflexible working arrangements, and a lack of employer understanding around disability and the need for reasonable adjustments.

Finally, there is a strong economic case against these cuts. Driving more disabled women and their families into poverty will only increase costs to the NHS, social care, and the wider economy while undermining potential gains in labour market participation. There is a common misconception that social security spending is 'out of control'. This is highly misleading as social security spending is lower than a decade ago and not projected to rise significantly in the coming years²³. Much of the increase in disability benefit caseloads is due to factors outside individual control, including the rising State Pension Age, NHS backlogs, the effects of Long Covid, and increasing mental health conditions among younger people²⁴.

Close the Gap strongly urges UK Government to withdraw the proposed cuts to disability benefits and critical support programmes like Access to Work. We urge decision makers to centre an intersectional gendered analysis which means recognising that the proposed reforms to disability benefits will significantly worsen the inequality and harm disabled women face and detrimentally impact their long-term economic outcomes. Instead, what is needed is an adequately funded, dignified social security system that supports disabled people, and recognises the distinct experiences of disabled women

²³ Disability News Service (2024) *Government claims of 'spiralling' spending on benefits are false and 'ideological', official figures show*

²⁴ Ibid.

and other marginalised groups, to allow them to thrive inside and outside of the labour market.

2.0 Implications for Scotland

While the plans for PIP are mainly an issue for England and Wales, there are still around 80,000 disabled people in Scotland waiting to be transferred to the Scottish Adult Disability Payment (ADP)²⁵. Scottish Government aims to have moved all PIP claimants in Scotland onto ADP by January 2026²⁶. It is not clear whether the changes to PIP outlined in the Green Paper will directly impact ADP but there will be an impact on Holyrood's block grant which will have significant implications for the Scottish Government budget. Across Scotland there are around 300,000 people receiving the Universal Credit health element and Employment Support Allowance who will be affected by the proposed cuts²⁷. Analysis produced for Trussell found that these reforms alone will push 15,000 people in disabled households in Scotland into severe hardship by 2030²⁸.

Furthermore, a number of interconnected Scottish policy priorities — including the Scottish Government's commitment to tackling child poverty, reducing the disability employment gap, and advancing women's equality — will be negatively impacted by the UK Government's proposed reforms. Cuts to reserved benefits such as PIP and changes to work-related requirements risk increasing poverty and insecurity, particularly for disabled women and unpaid carers, groups who are already more likely to be reliant on social security to top up low or precarious earnings²⁹.

The cumulative impact of these changes will also place additional strain on devolved services and the Scottish budget, which purports to mitigate UK Government social security policies through benefits like the Scottish Child Payment and Carer Support Payment. The UK Government's approach risks stripping essential support from the system as a whole.

²⁵ Inclusion Scotland (2025) *What about our welfare? Inclusion Scotland's response to the UK Government's Green Paper*

²⁶ Ibid

²⁷ Trussell (2025) *The Impact of the Universal Credit and Personal Independence Payment Bill in Scotland*

²⁸ Ibid.

²⁹ Close the Gap (2018) *Close the Gap response to the Scottish Government's consultation on Increasing the Employment of Disabled People in the Public Sector*

As an organisation focused on closing gendered gaps in labour market participation, Close the Gap is deeply concerned that these proposals will significantly worsen inequality for disabled women in Scotland. Without adequate and accessible support, many will be pushed further away from the labour market and into deeper poverty, compounding their economic inequality, and undermining the Government's aim of supporting disabled people into work and tackling child poverty.

As Close the Gap's area of expertise is women's labour market participation, our response focuses on those questions which relate to employment.

3.0 Answers to consultation questions

Q13. How can we support and ensure employers, including Small and Medium Sized Enterprises, know what workplace adjustments they can make to help employees with a disability or health condition?

Disabled women face a wide range of inequalities in employment including discrimination, inflexible work, inaccessible workplace, and lack of knowledge and awareness in organisations and line managers in particular on how to support disabled employees. Employers are legally required to provide reasonable adjustment but research by Close the Gap shows that disabled women in Scotland are often not able to get the reasonable adjustments they need.³⁰ Close the Gap specifically calls for mandatory disability pay gap action plans to sit alongside proposed disability pay gap reporting; effective monitoring of disability pay gaps and improved availability of intersectional data; increased capacity building across employer types and understanding of legal duties; and lastly, the implementation of reasonable adjustment passports.

3.1 Known Challenges

In addition to the policy recommendations outlined above, Close the Gap wishes to highlight known challenges when it comes to employer support of disabled women including workplace adjustments. It is critical that UK

³⁰ Close the Gap (forthcoming) *Disabled women's experiences of employment in Scotland*

Government be cognisant of the existing evidence on disabled women's experiences of employment in developing policy around this.

Delays and under resourcing of Access to Work

While Access to Work provides disabled employees with vital support that allows them to perform their job role, there are significant delays in accessing these measures. Indeed, while speaking at a Select Committee hearing, the UK Disability Minister acknowledged that “the situation is not in good shape”.³¹

According to recent reports, estimates suggest that there are over 37,000 unresolved Access to Work applications, leading to significant wait times for individuals needing support. The longest wait time for a claimant was 254 working days³². Ongoing research by Close the Gap on disabled women's experience of the labour market highlights that these delays in accessing Access to Work made it significantly more challenging from them to do their role to the best of their ability³³. Many disabled people who are employed are only able to have a job because of the tailored and personalised holistic support they receive from the Access to Work Scheme. We are therefore gravely concerned the Green Paper argues that funding of Access to Work is unsustainable – especially if the intention is to get more disabled people into employment.

Additionally, Close the Gap highlights media reports of leaked information from DWP sources that suggests there are plans for two waves of cuts to social security over the course of the year that will make it significantly harder for disabled people to secure support through the disability employment programme³⁴. This directly undermines the critical support disabled employees need to do their roles e.g., ergonomic equipment, assistive technology, interpreters etc.³⁵ We echo calls from disabled people's organisations for more of the critical investment in schemes that support disabled employees experience of work, not less.

³¹ Disability Rights UK (2025) *DWP admits 'Access to Work' support is failing Disabled people*

³² Ibid.

³³ Close the Gap (forthcoming) *Research on disabled women's experience of employment in Scotland*

³⁴ Disability News Service (2025) *Second wave of cuts could lead to 'decimation' of Access to Work scheme, but DWP refuses to comment*

³⁵ Ibid.

Line managers are essential to disabled women accessing employment and having a positive experience

Close the Gap's current research into disabled women's experience of work identified a common theme that line managers are often aware of their responsibilities regarding reasonable adjustments. However disabled women reported that this did not always translate to a meaningful and timely change when it came to implementing their reasonable adjustments.

For example, while 62% of respondents indicated that they strongly agreed or agreed with the statement "My line manager was fully aware of their legal responsibilities in providing reasonable adjustments". However, only 36% of the respondents had their reasonable adjustments put in place immediately, with just 19% indicating that adjustments had never been put in place. This suggests a very concerning gap between understanding and implementation, and shows that many disabled women are being failed by their line managers, and wider organisational practice.

Another common theme identified in Close the Gap's research is that disabled women frequently face unfair questioning of their skills and capabilities, which can lead to unjust formal and informal performance management. This is sometimes because reasonable adjustments have not been put in place, only partially implemented, or there has been a delay in meeting access needs. Where disabled women's access needs are not met in the workplace, it makes it more difficult for them to do their job well or at all. This is often incorrectly interpreted by line managers as a performance issue which in turn creates increased stress for disabled women, and contributes to sickness absence and attrition rates.

Line managers are important gatekeepers for reasonable adjustments, yet many lack the capability and confidence to support disabled staff. A Business Disability Forum survey³⁶ found that:

- 78% of disabled employees said they, rather than their employer, had to initiate the process of getting adjustments.
- 58% of disabled employees said getting the adjustments they needed was due to how assertive and confident they are to ask for that support.

³⁶ Business Disability Form (2023) *The Great Big Workplace Adjustments Survey 2023- what did people tell us?*

- 56% of disabled employees said there are still disability-related barriers in the workplace after adjustments have been made.
- Only 37% of disabled employees feel their employer is genuine about removing all disability-related barriers and making the workplace inclusive for disabled employees.
- Only 18% of disabled employees said their adjustments have removed all barriers in the workplace.
- Just 10% of disabled employees said it was easy to get the adjustments they needed.

This aligns with other research on disabled people's access to reasonable adjustments. For example, research from the Trades Union Congress found that:

- Over a third (34%) of disabled workers polled were uncomfortable talking about their health, including disability, impairment, or long-term health condition with their manager or supervisor.
- One in five (20%) disabled workers reported that they hadn't told their employer they were disabled, with almost six in ten (56%) saying that it was because they were worried about negative repercussions, and a third (34%) saying they were worried their employer would think they could not do their job.
- One in five disabled workers were dissatisfied with the support they received from their manager or supervisor (22%).
- A quarter of disabled workers disclosed to the TUC that they were dissatisfied with their opportunities for progression (25%)³⁷.

The evidence clearly shows that disabled people's experiences of the labour market can vary significantly depending on their line manager, employer and workplace culture. Evidence shows for most employers, improved equality practice does not happen voluntarily.

Formal and Informal Performance Management

Emerging findings from Close the Gap's research on disabled women's experiences of the Scottish labour market has revealed that 52% (336 out of 647) of those surveyed have had their performance questioned, either formally

³⁷ Trade Union Congress (2025) *Disabled workers' access to reasonable adjustment*

or informally, as a result of their disability. This resulted in 81% of these disabled women feeling they needed to work harder to prove they were as capable as their colleagues. Standardised absence and performance procedures, which do not take account of disability and gender can inadvertently penalise disabled women and make them feel judged and undermined. One respondent stated that “I have been made to feel a burden and not a team player”.

There is a need for disability and gender-competent performance and absence management frameworks, which recognise the barriers disabled women face at work and effectively address each employee’s disability-related needs. Equally important is the need to build knowledge and confidence in line managers so that they can adequately support disabled employees to do their job.

3.2 Policy Recommendations

Mandatory Disability Pay Gap Action Plans

Evidence shows that disabled women face higher levels of occupational segregation, low pay, underemployment, and exclusion from progression opportunities³⁸. These poorer outcomes are shaped by structural discrimination and are further exacerbated by the lack of employer action on intersecting inequalities.

Mandatory disability pay gap reporting, if effectively designed and implemented, would be a vital step in addressing the workplace inequalities faced by these groups. However, it is essential that the actions taken to narrow pay gaps are underpinned by a robust intersectional analysis to ensure they drive meaningful change for all those who face discrimination at work.

Evidence on current gender pay gap reporting in Scotland and the UK indicates that regulations are not driving employers to take action on their gender pay gaps. Since 2013, Scottish public bodies have been required to publish their gender pay gap under the Scottish-specific duties of the public sector equality duty. The duties are intended to work as a set, for example, public bodies

³⁸ Close the Gap (forthcoming) *Research on disabled women’s experience of employment in Scotland*

should use employee data gathered under regulation six, alongside gender pay gap information reported under regulation seven, and occupational segregation information published under regulation eight, to identify key gendered inequalities in their organisation, and develop action to address these. Despite this, public bodies in Scotland have largely published datasets that sit unutilised, and the majority are not using the data they publish to develop action. In 2023, 82% public bodies published a pay gap of over 5%, and yet only 9% of these had published an equality outcome or action that addressed its causes³⁹.

The findings of Close the Gap's assessment of Scottish gender pay gap reporting under the Scottish-specific duties align with UK and international evidence on the necessary regulation to secure employer action on the gender pay gap. The UK gender pay gap reporting regulations were introduced in 2017 and require employers with 250 or more employees to publish their gender pay gap, gender bonus gap, and occupational segregation information. Since employers first reported their data in 2018, there has been no change in the gender pay gap among employers covered by the regulations: at a Scotland level, this gender pay gap was 12% in 2018, and 12% in 2023⁴⁰.

Wider UK and international evidence also shows that employers are unlikely to take action on gender equality unless they are compelled to do so by law.⁴¹ A 2020 analysis of international gender pay gap reporting regimes found that, in order to be effective, reporting requirements must include mandatory, measurable action plans and clear mechanisms for accountability and transparency.⁴² The Global Institute for Women's Leadership at King's College London recommended that employers should be required to create time-bound targets to redress pay gaps, setting out clear and measurable goals.⁴³

The evidence shows that pay gap reporting alone is not enough to compel employers to take action to tackle workplace inequalities. There is an urgent

³⁹ Close the Gap (2025, forthcoming) *Briefing on the public sector equality duty gender pay gap duty*

⁴⁰ Close the Gap (2023) *Positive Shift, Persistent Problems: A five-year analysis of Scottish employer gender pay gap reporting*

⁴¹ Global Institute for Women's Leadership (2020) *Gender pay gap reporting: A comparative analysis*; IFF Research (2015) *Company Reporting: Gender pay data*, Government Equalities Office; Winterbotham et al (2014) *Company Reporting: gender pay gap data*, Government Equalities Office: London; and Close the Gap (2013) *Missing out on the benefits: Summary of research on the reporting of the gender pay gap in Scotland*

⁴² The Global Institute for Women's Leadership et al (2021) *Bridging the gap? An analysis of gender pay gap reporting in six countries*.

⁴³ Ibid

need for more effective regulations to tackle the employment inequalities affecting disabled women and other women experiencing gendered discrimination at work. Such regulations must be action-focussed, and not just a requirement to publish pay and workforce data. Pay transparency measures are welcome, but without mandated action, do not create the necessary change. Crucially, the regulations must specify that employers must use their data to develop and publish a targeted action plan to tackle the inequalities they identify, and report progress on this at regular intervals. Close the Gap therefore strongly urges UK Government to pre-emptively address this by establishing mandatory disability reporting as part of the Equality (Race and Disability) Bill: mandatory ethnicity and disability pay gap reporting.

Monitoring Disability Pay Gaps

It is essential that the implementation of disability pay gap reporting measures are monitored and evaluated to ensure they are achieving the desired results. Robust and intersectional data collection is fundamental to measuring success. This includes significantly improving the range of intersectional labour market data on disabled people's experiences, for example in the Labour Force Survey and Annual Population Survey. UK Government should work with Office for National Statistics and other producers of official statistics to increase the range and depth of intersectional data available at national and regional levels. This work should be co-designed with disabled people's organisations to develop a robust and effective approach to data gathering and analysis on employer support.

An ongoing challenge which contributes to the inequalities disabled women experience in the labour market is the lack of detailed, Scotland-specific and UK intersectional data on disabled women's employment experiences. It is therefore crucial that reporting includes disaggregated and intersectional data, to ensure that the experiences of disabled women are fully understood and addressed in workplace equality efforts. We therefore call on UK Government to work with producers of official statistics to build intersectional gender competence among decision makers and analysts to improve the quality of data available.

Without continually measuring the impact of workplace adjustments, systemic failings remain invisible. Employers must report on disability adjustments and outcomes to measure success, learn from mistakes, and share best practice with other employers.

Close the Gap calls for the UK Government, or appropriate Government body such as Skills England, to produce regional and sectoral level analysis to identify trends and target support programmes accordingly.

Capacity Building Across Employer Types

Employer practice on equality tends to vary by sector and by size of organisation. In general, the public sector often has more developed equality practice, in part because of the regulations levers such as the public sector equality duty. There is evidence of poorer equality practice in the private sector, especially in small and medium enterprises (SMEs). SMEs are less likely to have a dedicated HR function or equality role, and as a result equality practice tends to be poorer. We also acknowledge that some SMEs may struggle to pay for reasonable adjustment costs while awaiting Access to Work support. Conversely, larger organisations have more resources to pull from yet often have more rigid and bureaucratic internal structures which can preclude work on equality where this is not already a strategic priority.

Awareness of legal obligations and available support for disabled people is low among employers, especially regarding Access to Work, which is a critical programme to support disabled women into work. A 2023 Work and Pensions Committee report recommended DWP launch marketing campaigns to raise employer and claimant awareness of Access to Work and broader legal obligations⁴⁴. However, despite delivery of DWP campaigns, systemic delays persist: 62,000 applications were outstanding in February 2025, with over 60,000 people waiting more than nine months⁴⁵. The lack of awareness of Access to Work amongst employers has placed the responsibility to educate and inform the employer with the disabled employee, which can be a daunting prospect, particularly during the recruitment process⁴⁶.

⁴⁴ UK Parliament (2023) *Plan for Jobs and employment support: Government Response to the Committee's Eighth Report*

⁴⁵ The Times (2025) *Disabled people forced to turn down jobs over 9-month wait for support*

⁴⁶ Ibid.

Close the Gap calls for greater awareness around employers' statutory duties and examples of best practice. This could include sector-specific capacity building hubs offering peer learning, guidance and accessible toolkits. Employers regardless of size should take appropriate measures to better support disabled employees, particularly disabled women. There should also be targeted campaigns for SMEs to signpost employers to existing Access to Work support to support this ambition. This will help alleviate the burden on disabled women to educate their employer, while also enabling the employer to confidently support their employees with health conditions and implement reasonable adjustments, enabling disabled women to enter the labour market and stay in work.

Implement Reasonable Adjustment Passports

Close the Gap echoes the call from the Trade Union Congress to implement reasonable adjustment passports. A reasonable adjustment passport is a live record of adjustments between an employee and their line manager that supports them at work due to their health condition, impairment or disability⁴⁷. The passport ensures reasonable adjustments are up-to-date, appropriate, practical and in place. They also streamline transitions to new roles or new line managers as the disabled employee does not have to re-explain or renegotiate the support in place⁴⁸. We believe this will be mutually beneficial for both the employer and the disabled employee and can be readily implemented across sectors.

4.0 Conclusion

Close the Gap strongly opposes the proposals set out in the Pathways to Work Green Paper, which risk deepening existing inequalities and disproportionately harming disabled women — one of the most marginalised groups in the labour market. The proposed reforms are not only unjust but also economically short-sighted, threatening to increase poverty and hardship while placing additional strain on already stretched public services. Throughout this response, we have drawn attention to the deep structural barriers that disabled women face in accessing and sustaining employment, including inaccessible workplaces,

⁴⁷ Trade Union Congress (2019) *Reasonable Adjustment Disability Passports*

⁴⁸ Ibid.

discrimination, the gendered impact of care responsibilities, and inadequate employer support. Rather than addressing these barriers, the proposals in the Green Paper risk penalising disabled people, and disproportionately disabled women, for circumstances beyond their control.

We are particularly concerned by the Government's framing of disability benefits as "unsustainable" and a barrier to work. This narrative is misleading and harmful. Disability benefits such as PIP are essential for many disabled women to manage daily life, including the ability to work. Removing or reducing this support will push more disabled people—particularly disabled women—out of employment and into poverty.

The proposals will also have serious implications for policies designed to support disabled women in Scotland. Cuts to reserved benefits will undermine the Scottish Government's devolved commitments to reducing child poverty, advancing women's equality, and closing the disability employment gap. At the same time, increasing pressure on the Scottish budget and social security system will make it more difficult to mitigate these harmful changes at the devolved level.

Close the Gap urges UK Government to ensure that workplace support for disabled people is improved by introducing mandatory action plans for disability pay gap reporting. This is the necessary lever that will enable employers to gather data on disabled employees and their experiences, and develop the much-needed action to tackle the barriers they face. This includes mandatory disability pay gap action plans to sit alongside proposed disability pay gap reporting; effective monitoring of disability pay gaps and improved availability of intersectional data; increased capacity building across employer types and understanding of legal duties; and lastly, the implementation of reasonable adjustment passports. These are the kinds of evidence-led, inclusive actions that will genuinely support disabled women into, and to remain in, fair and decent work.

We call on the UK Government to take a fundamentally different approach—one that is rooted in dignity, equality, and fairness. This must involve meaningful engagement with disabled people, including disabled women, and disabled people's organisation and a clear commitment to tackling the

structural inequalities that shape their lives. Only by doing so can we build a truly inclusive labour market and a social security system that reflects the needs, realities, and rights of disabled women.